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Admitted to Practice Law
in the State of New York

January 31, 2024

Via ECF

Hon. Lee G. Dunst, USMJ
United States District Court, EDNY
100 Federal Plaza
Central Islip, NY 11717

Re: Jonatan Barahona and Hector Hernandez v. Paradise Tree
Service & Landscape, Corp. and William Nieto
Venue: United States District Court, Eastern District of New York
Civil Action No.: 2:21-cv-05400 (GRB)(AYS)
Letter Motion to Withdraw as Counsel

Dear Judge Dunst:

Regarding the above matter, I represent the Defendants, Paradise Tree Service & Landscape, Corp. and William Nieto. I am hereby respectfully requesting that I be granted the right to withdraw as counsel for the Defendants. I called Plaintiffs' counsel today at approximately 3:30 p.m. to meet and confer with him regarding this application. I spoke with him. I informed him that I was going to file a motion to withdraw as counsel and would also be requesting the right to submit my reasons, in camera. Additionally, I informed Plaintiffs' counsel that I would request the Court adjourn the scheduled trial dates from February 28, February 29 and March 1, 2024, to a later date to permit the Defendants to hire new counsel or prepare for the trial pro se, if they so choose. When we spoke, Plaintiffs' counsel did not raise objections to my applications but I'm not sure if he will do so, in the future, after speaking with his clients.

Accordingly, I respectfully request to be permitted to withdraw as counsel after providing my reasons for doing so, in camera. Furthermore, I respectfully request the scheduled trial be adjourned at least 30 days or to other dates determined by this court to allow Defendants to hire new counsel or prepare for trial, pro se. I am serving a copy of this letter upon my client via email, but I have told him this past week, I would be making such an application, after we attempted several times to resolve the issues motivating me to make this application. Thank you for your courtesy. Respectfully, I remain,

Sincerely yours,

Glenn Ingoglia

Glenn J. Ingoglia

**c.c.: Via ECF and Email: steven.moser@moserlawfirm.com
Plaintiffs' Counsel
Steven J. Moser, Esq.**

**Via Email: nietow@live.com
William Nieto, Defendant
William Nieto, Owner, Defendant, Paradise Tree Service & Landscape Corp.**